

JONES DAY

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July 30, 2019

BY ELECTRONIC DELIVERY

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street S.W.
Washington D.C. 20554

**Re: Permitted Oral *Ex Parte* Notice
Wireless E911 Location Accuracy Requirements
PS Docket No. 07-114**

Dear Ms. Dortch:

On July 26, 2019, representatives of NextNav, LLC (“NextNav”) participated in a meeting with the staff of the Public Safety and Homeland Security Bureau (“PSHSB”). Participating in the meeting on behalf of the Bureau were David Furth, Rasoul Safavian, John Evanoff, Nellie Foosaner, Ken Carlberg, and Erika Olsen, along with their interns Jaime McCoy and Natalie Seales. Participating in the meeting on behalf of NextNav were Gary Parsons, Chairman; Ganesh Pattabiraman, CEO and Co-Founder; Bruce Cox, Senior Director, Regulatory & Public Safety; and the undersigned.

The primary purpose of the meeting was to urge the Commission to move expeditiously in the adoption of a z-axis accuracy metric for wireless calls to E911 emergency services. The participants also discussed why it is not currently possible to convert a highly accurate “floor level” vertical altitude measurement into the corresponding “floor number” of a building. First, there is no uniformity in the height of each floor level in different buildings and many buildings have unique floor numbering systems (such as skipping the 13th floor) that cannot be taken into consideration absent extensive mapping of every building in a covered area. Second, regardless of the precision of the vertical location information, the current requirement of a horizontal location fix within 50 meters does not provide sufficient accuracy to reliably place a wireless caller in a particular building. Thus, the conversion of vertical altitude into a floor number could inadvertently place a wireless caller in the wrong building, inhibiting rather than helping emergency response efforts.

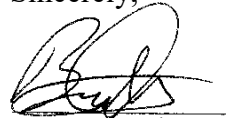
The parties also discussed the options that are available with respect to defining “z-axis capable handset” for purposes of imposing penetration requirements for vertical location capabilities by the April 2021 and 2023 deadlines. Finally, the NextNav representatives noted the

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possibility of giving wireless carriers the option to make vertical location capabilities available to 80 percent of buildings in excess of three stories in each of the top 25 and 50 Economic Areas as an alternative compliance metric to the existing requirement to cover 80 percent of the population. The former approach received significant stakeholder support during the recent comment process and would better ensure that vertical location services are actually available where they are needed to support emergency first responders.

Please contact the undersigned if you have any questions about this matter.

Sincerely,


Bruce A. Olcott